

OXFORD ENGINEERS & CONSULTANTS, INC.
PROJECT CORRESPONDENCE

To: Mr. Joseph McDowell, Remedial Project Manager
U.S. Environmental Protection Agency - Region III

From: Richard P. Almquist, Jr. (RAJ)

Date: July 12, 2000

Subject: Crater Resources, Upper Merion Township, Montgomery County, Pennsylvania
Project Number: OPG99009

BACKGROUND

As you are aware, OXFORD Engineers & Consultants, Inc. ("Oxford") is the environmental consultant for O'Neill Properties Group, L.P. ("O'Neill"), the party contemplating purchase of several parcels (the "Quarry Parcels") of the above-referenced Superfund Site (the "Superfund Site"). As you are also aware, O'Neill has expressed its intention to develop a portion of the Quarry Parcels, hereafter known as "Tract 1A", in advance of the issuance of the Record of Decision ("ROD") by the United States Environmental Protection Agency ("EPA"). Tract 1A is located between Quarries 1 and 2, an area which, until the recent issuance of the Proposed Remedial Action Plan ("PRAP") by EPA, had not been contemplated for a remedy in any of the draft Feasibility Studies for the Property. The Recommended Alternative SW-3 in the recently issued PRAP, addresses investigative needs relative to the entire length of the former Waste Ammonia Liquor ("WAL") pipeline, including areas extending beyond O'Neill's development interests.

In a letter from EPA to the Upper Merion Township Board of Supervisors, dated April 27, 2000, EPA indicated that the agency had no objection to construction activities proceeding on Tract 1A prior to the issuance of their ROD. EPA did indicate, however, that it was their belief that a portion of the former WAL pipeline crossed the Tract 1A parcel and they requested that additional investigation be performed to determine if portions of the pipeline remained. Oxford subsequently conducted a geophysical investigation of the former pipeline pathway beginning from the point where it entered the Quarry Parcels. The results of that investigation were submitted to you on April 27, 2000. The investigation determined that approximately 100 feet of former pipeline was present from the point where it entered Quarry Parcels from the adjacent lands owned by Liberty Property Trust ("Liberty") to a point just west of the western end of Quarry 2 and east of the Tract 1A parcel. At that point, the pipe terminated. Further geophysical investigation did not identify remnants of the pipeline between that terminus and Quarry 1.

Given EPA's concerns regarding the potential for contamination from the former aboveground WAL pipeline, O'Neill authorized Oxford to proceed with an investigation of the former

Mr. Joseph McDowell
July 12, 2000
Page 2

aboveground pipeline pathway from its terminus on the Quarry Parcels to its former discharge point at Quarry 1. Oxford prepared a sampling plan which was submitted to you June 1, 2000, and subsequently discussed with you the following week. Oxford completed the investigations described in that sampling plan and submitted the results of the investigation to you on June 23, 2000. The results of the investigation determined that there was limited, minor impact to the surficial soils at two (2) locations: 1) adjacent to the point of its terminus just east of the Tract 1A parcel, and 2) at the point where the pipeline discharged into Quarry 1 just west of the Tract 1A parcel.

In addition to the two (2) locations of minor impact, small quantities of hardened WAL have been observed on the surface of the soil in close proximity to the former pipeline pathway. The results of the analysis of soil samples from these areas indicated that the soils had not been impacted. Hardened areas of former WAL have also been identified east of the Tract 1A parcel boundary along an access roadway leading from a point near Renaissance Boulevard toward the former pipeline pathway. These areas are consistent with those identified by EPA in previous investigations associated with the Superfund activities.

SCOPE OF WORK

The remainder of this memorandum outlines a scope of work to remediate the portions of the former WAL pipeline remaining on the Quarry Parcels, the two (2) areas of minor impact identified during the pipeline pathway soil investigation, the small areas of hardened WAL along the former aboveground pipeline pathway on Tract 1A and the Quarry Parcels, and the areas of hardened WAL along the access roadway east of the Tract 1A parcel. It is our intent for this work to satisfy EPA's investigation and remediation requirements intended for the portions of the former pipeline pathway which cross the Quarry Parcels and Tract 1A. A drawing depicting the proposed areas of work has been attached as Figure 1 for your reference.

REMOVAL OF FORMER PIPELINE

Based on the results of the previously conducted pipeline investigations, a remediation contractor will be mobilized to the Quarry Parcels to perform the pipeline removal activities. The contractor will utilize the appropriate excavation equipment to accomplish the removal of both the pipeline and the affected soils surrounding the pipeline. Soils will be field-screened using a combination of visual and olfactory methods to determine if the soils had been impacted by the WAL from the pipeline. Soils will also be field-screened using a Photoionization Detector ("PID") to confirm the visual and olfactory observations.

The pipeline and surrounding soils will be removed and stockpiled for eventual off-site disposal, as discussed below. Even if field observation methods do not indicate impact, the pipeline excavation

Mr. Joseph McDowell

July 12, 2000

Page 3

will be over-excavated to ensure that potentially impacted soils have been removed. Soils that are determined to have been impacted or suspected to have been impacted will be segregated from those soils that have not been impacted, will be stockpiled on plastic sheeting, and will be covered with plastic until cleared for off-site disposal. The excavated pipeline and any WAL encountered during the removal activities will be placed in lined and covered containers on-site until cleared for off-site disposal.

REMOVAL OF TWO (2) PIPELINE IMPACTED AREAS

The remediation contractor will excavate the two (2) areas of minor soil impact from the WAL pipeline at the terminus of the pipeline on the Quarry Parcels and at the point where the pipeline discharged into Quarry 1. At each of these points, an area measuring approximately 6-feet long by 6-feet wide by 3-feet deep will be excavated and stockpiled on plastic sheeting along with the soils excavated during the pipeline removal activities.

REMOVAL OF HARDENED WAL

The remediation contractor will excavate the hardened WAL from those points where it is visible along the former pipeline pathway on Tract 1A and the areas identified along the access road on the Quarry Parcels located east of Tract 1A. The hardened WAL has been observed to be present within the top 1-foot of surficial soils and has not been observed to have migrated to greater depths, therefore the remediation contractor will over-excavate these areas to a depth of approximately 2-feet below grade surface to ensure that the hardened WAL is sufficiently removed. The hardened WAL and affected soils will be stockpiled in the lined and covered containers along with the removed pipeline.

CONFIRMATORY SAMPLING AND LABORATORY ANALYSIS

Following the removal of the pipeline and the soils from the areas described above, post-excavation soil samples will be collected to confirm that the affected soils have been sufficiently removed. For the pipeline excavation on the Quarry Parcels, one (1) soil sample will be collected for every 25-feet of pipeline excavation. For the excavations of the two (2) areas of minor impact at the terminus of the pipeline on the Quarry Parcels and at the point where the pipeline discharged into Quarry 1, two (2) soil samples will be collected from the bottom of the excavation. For the areas where hardened WAL is excavated, one (1) sample will be collected from each excavation location or, if an excavation area exceeds 25-feet in length, one (1) sample will be collected for each 25-feet of excavation. In addition to the confirmatory samples, additional Quality Assurance and Quality Control soil samples will be collected in a manner consistent with EPA protocol.

Mr. Joseph McDowell

July 12, 2000

Page 4

All soil samples will be submitted to a certified analytical laboratory for analysis for Volatile Organic Compounds using EPA Method 8260B, Semi-Volatile Organic Compounds using EPA Method 8270C, Priority Pollutant Metals using appropriate EPA methodology, and Total Cyanide using EPA Method 9010B.

WASTE CHARACTERIZATION AND DISPOSAL

Samples of the excavated soils will be collected for waste characterization analysis to determine a suitable method of off-site disposal. Samples from the pipeline and WAL containers will also be collected for waste characterization analysis to determine a suitable method for off-site disposal. Following receipt of the characterization analysis, arrangements will be made for disposal of the soils, pipeline, and WAL at suitable, permitted disposal facilities. Following approval from the selected disposal facility(ies), the stockpiled soils and the pipeline and WAL containers will be transported to the disposal facility(ies). All waste materials removed from the site will be transported using appropriate manifesting protocols.

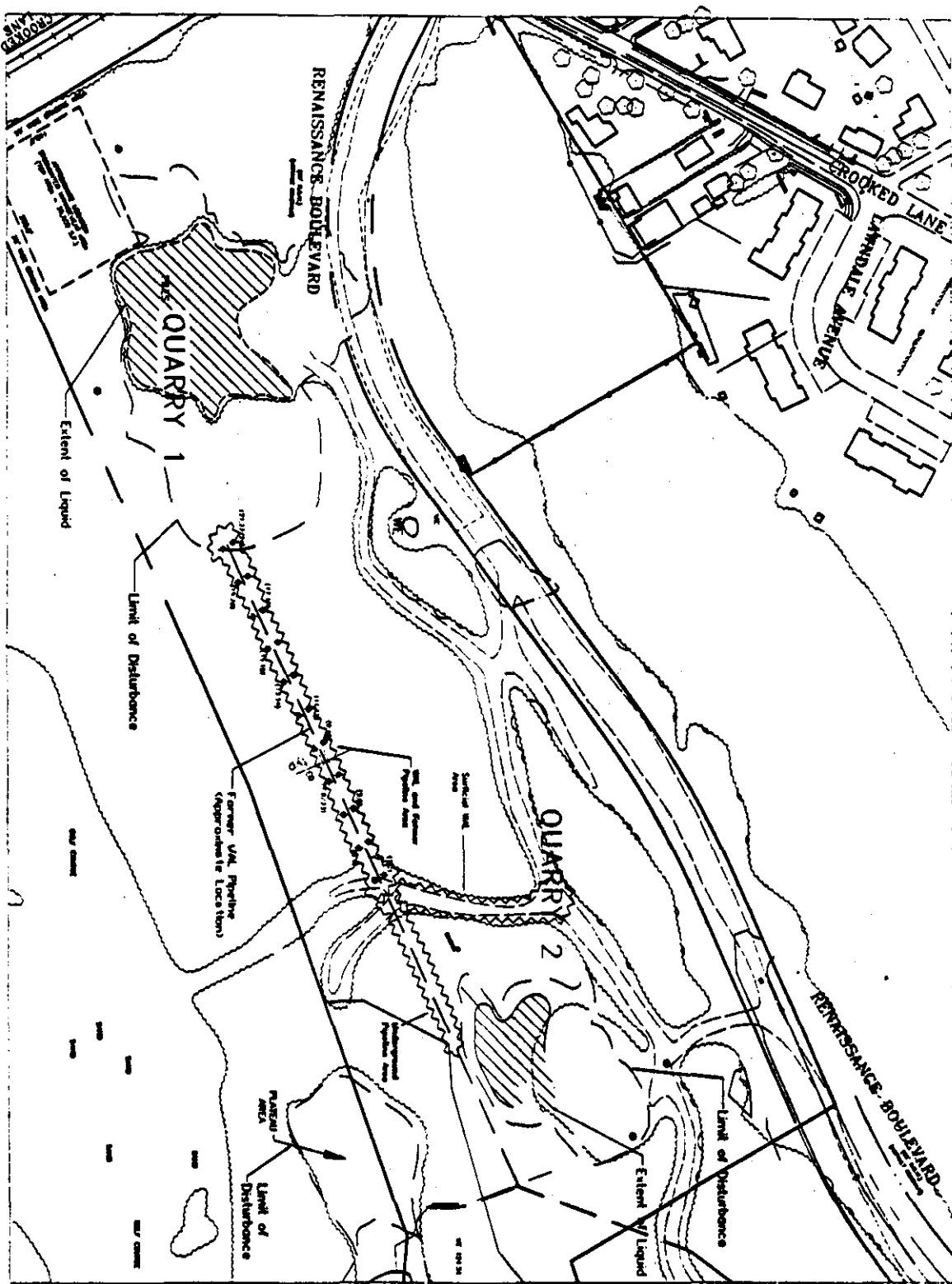
REPORTING

Following the completion of the excavation, removal, and disposal activities, a report summarizing those activities will be presented to EPA. The report will contain summaries of the materials and methods utilized to complete the remedial activities, the results of the post-excavation analyses, and copies of the disposal documentation.

Based on the results of previous WAL pipeline remediation activities undertaken by other parties, including Liberty, the WAL impacts are generally limited to areas within a few feet of the former pipeline pathway. O'Neill intends to complete the activities outlined above prior to the commencement of construction on the Tract 1A parcel. As previously indicated, O'Neill intends for this Scope of Work to satisfy the remediation requirements for the former WAL pipeline pathway that crosses the Quarry Parcels, including the Tract 1A parcel. Should you have questions or comments regarding the scope described above, please feel free to contact me at (610) 650-9669, ext. 116. I look forward hearing from you soon.

Enclosure

cc. Mr. J. Brian O'Neill
Mr. Richard Heany
Mr. Guy Wolfington
Kevin W. Walsh, Esq.
Mitchell E. Burack, Esq.
Robert J. Kerns, Esq.



AR306166

<p>OXFORD</p> <p>Engineering & Construction, Inc.</p> <p>1000 West 10th Street</p> <p>Fort Worth, TX 76102</p> <p>1-800-841-0000</p>		<p>Legend</p> <p>Rocked Areas</p> <p>Gravel Areas</p> <p>Paved Areas</p> <p>Former VMA Pipeline (deposited location)</p> <p>Limit of Disturbance</p> <p>Extent of Liquid</p>							
<p>Scale</p> <p>1" = 100'</p>		<p>North Arrow</p>							
<p>Project Information</p> <p>Project Name: Renaissance Boulevard</p> <p>Project Number: AR306166</p> <p>Project Date: 1/1/00</p>		<p>Revision History</p> <table border="1"> <tr> <th>Rev</th> <th>Description</th> </tr> <tr> <td>1</td> <td>Initial Design</td> </tr> <tr> <td>2</td> <td>Revised Design</td> </tr> </table>		Rev	Description	1	Initial Design	2	Revised Design
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